



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
WATER

March 18, 2004

Ms. Ernesta Ballard, Commissioner  
Alaska Department of Environmental Conservation  
410 Wiloughby Avenue, Suite 105  
Juneau, AK 99801-1795

Dear Ms. Ballard:

I am seeking your help in learning more about state and local efforts to monitor and protect children from exposure to lead in drinking water at schools and day care facilities and to share information about EPA's efforts to date in this area.

Washington, D.C. is experiencing seriously elevated levels of lead in drinking water in many homes served by the District's public water system. An investigation is underway to identify a solution to the problem, which appears to be the result of an increase in the corrosivity of drinking water due to changes in water treatment. Increased corrosion is causing excessive leaching of lead from lead service lines serving homes and from plumbing fixtures into drinking water at the tap.

While this event has placed a national spotlight on the issue of lead in drinking water, we believe the situation in the District is unique. However, I have also seen news reports from across the country focused on concerns related to elevated lead levels in school drinking water. I would like to better understand the actions states are taking to ensure that children are not exposed to lead from drinking water in schools.

Children are most at risk from health effects associated with lead exposure. Elevated blood lead levels can delay normal physical and mental development in infants and young children, and cause slight deficits in the attention span hearing, and learning abilities of children. The Centers for Disease Control and Prevention (CDC) has identified a blood lead level of 10 micrograms per deciliter as the level of concern for lead in children.

EPA regulates lead in drinking water through the Lead and Copper Rule, authorized by the 1986 Amendments to the Safe Drinking Water Act. When results from tap sampling indicate that more than 10 percent of homes tested have lead concentrations that exceed a 15 micrograms per liter (ppb) action level, public water systems must take actions to control corrosion and to inform the public about steps they should take to protect their health. However, schools are only subject to the requirements of the rule if they have their own water system.

The Lead Contamination Control Act (LCCA) of 1988 recalled drinking water coolers with lead-lined water reservoir tanks and banned new drinking water coolers with lead parts. The Act also established a technical assistance program to support state activities to reduce lead contamination in schools. In 1989, EPA issued guidance recommending that schools receiving water from public water systems take remedial action on an individual outlet whenever the lead levels exceeded 20 ppb at that outlet. EPA has also released several other documents on lead control programs for drinking water over the past several years (enclosed).

I would like to better understand if your state is currently implementing a program to control lead in drinking water for schools and day care facilities. If the state does have such a program, I would like to know how it is structured and the results of the program. If the state is not implementing a program, has the state taken other steps to reduce lead exposure in schools? I would also be interested in hearing how you see EPA working collaboratively to further your state's efforts to implement this voluntary program.

I would very much appreciate it if you could provide a response to this letter by May 1, 2004. If you have any questions, please contact me or Cynthia C. Dougherty, the Director for the national drinking water program in the Office of Ground Water and Drinking Water at (202) 564-3750. I have also requested that Ms. Dougherty work with our Office of Enforcement and Compliance Assurance to undertake a national review of compliance with the Lead and Copper Rule. I thank you for your attention to this important public health matter.

Sincerely,

/s/

Benjamin H. Grumbles  
Acting Assistant Administrator

Enclosure

cc. State Department of Health Commissioner  
EPA Regional Administrators  
State Drinking Water Administrators

## Enclosure

### **EPA Material on Managing Lead in School Drinking Water**

EPA website on Lead in Drinking Water: Schools and Day Care Centers -  
<http://www.epa.gov/safewater/lead/schoolanddccc.htm>.

Is There Lead in the Drinking Water?: You Can Reduce the Risk of Lead Exposure from Drinking Water in Educational Facilities, EPA 903-F01-002, 2002. Also available at  
<http://www.epa.gov/safewater/lead/pdfs/v2final.pdf>.

Lead in Drinking Water and Schools and Non-residential Buildings, EPA 812-B-94-002, 1994. Also available at <http://www.epa.gov/safewater/consumer/leadinschools.pdf>.

Sampling for Lead in Drinking Water in Nursery Schools and Day Care Facilities, EPA 812-B-94-003, 1994. Also available at <http://www.epa.gov/safewater/lcrmr/nursery.pdf>.

Lead in School Drinking Water, EPA 5709-89-001, 1989.